

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

WILLIAM JAY SHARP,

Plaintiff,

v.

ALLY FINANCIAL INC.,

Defendant.

Civil Action No. 6:15-cv-06520

**NOTICE OF FILING  
MOTION FOR SUMMARY  
JUDGMENT**

**TO: ALL COUNSEL OF RECORD:**

**PLEASE TAKE NOTICE** that on a date and time to be determined by the Court, or as soon thereafter as counsel may be heard, the undersigned, attorneys for Defendant Ally Financial, Inc., (“Ally”), shall move before the Honorable Elizabeth A. Wolford, at the United States District Court for the Western District of New York, 2330 U.S Courthouse, 100 State Street, Rochester, New York 14614, for entry of an Order Granting Defendant’s Motion for Summary Judgment, and for such other relief as may be just and proper.

**PLEASE TAKE FURTHER NOTICE** that in support of this Motion for Summary Judgment, the undersigned shall rely upon the accompanying Memorandum of Law submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested if this matter is contested.

Dated: August 2, 2016

By: /s/ Jason E. Manning  
Jason E. Manning  
TROUTMAN SANDERS LLP  
222 Central Park Avenue  
Virginia Beach, Virginia 23462  
Telephone: (757) 687-7564  
E-Mail: [jason.manning@troutmansanders.com](mailto:jason.manning@troutmansanders.com)  
*Counsel for Defendant*

CERTIFICATE OF SERVICE

I certify that on the 2<sup>nd</sup> day of August, 2016, I electronically filed the foregoing *Notice of Motion for Summary Judgment* with the Clerk of the Court using the ECF system, which will send notification of such filing to:

Kenneth R. Hiller, Esq.  
Seth J. Andrews, Esq.  
Law Offices of Kenneth Hiller, PLLC  
6000 North Bailey Ave., Suite 1 A  
Amherst, NY 14226  
E-mail: [sandrews@kennethhiller.com](mailto:sandrews@kennethhiller.com)  
E-mail: [khiller@kennethhiller.com](mailto:khiller@kennethhiller.com)

By: /s/ Jason E. Manning  
Jason E. Manning  
TROUTMAN SANDERS LL  
222 Central Park Avenue  
Virginia Beach, Virginia 23462  
Telephone: (757) 687-7564  
E-Mail: [jason.manning@troutmansanders.com](mailto:jason.manning@troutmansanders.com)  
*Counsel for Defendant*

28851315